

EXHIBIT 1

**UNITED STATES DISCRIT COURT
SOUTHERN DISTRICT OF NEW YORK**

PROJECT VERITAS and PROJECT
VERITAS ACTION FUND,

Plaintiffs,

v.

JAMES O'KEEFE, TRANSPARENCY 1,
LLC d/b/a O'KEEFE MEDIA GROUP, RC
MAXWELL, and ANTHONY
IATROPOULOS,

Defendants.

Civil Action No. 7:23-cv-04533

DECLARATION OF JAMES
O'KEEFE

I, JAMES O'KEEFE, hereby depose and declare:

1. I am over 18 years.
2. I am the founder and principal of O'Keefe Media Group, LLC ("OMG"), a for-profit company.
3. Prior to forming O'Keefe Media Group, LLC, I founded Project Veritas and Project Veritas Action Fund, two affiliated not-for-profit corporations, in 2010. From the time I founded Project Veritas in 2010 until 2023, I served as its Chief Executive Offer and a member of its Board of Directors.
4. I was terminated from my role as Chief Executive Officer of Project Veritas in 2023 as well as removed from its Board of Directors.
5. Both Project Veritas and OMG are primarily engaged in investigative journalism, with a special emphasis on video exposés exposing governmental and

corporate corruption and malfeasance.

6. During my tenure with Project Veritas, I worked long hours, typically between 80 to 100 a week, and traveled intensively, leaving me on the road as many as 300 days a year.

7. During this time, Project Veritas saw tremendous growth in annual donations, the scope and scale of its reporting, and its national and international name recognition.

8. As one example, between 2012 and 2020 Project Veritas' annual revenue grew from less than \$740,000 to over \$22 million. As a non-profit, Project Veritas' revenue was driven largely by fund raising, a task for which I was chiefly responsible, and which consumed a great deal of my professional time.

9. As another example, in early 2023, shortly before my termination, Project Veritas broke the largest story in its history—an exposé revealing an international pharmaceutical company's failure to disclose crucial health information about a widely used vaccine. This story was viewed over 50 million times and was seen all over the world.

10. As the Chief Executive Officer, I was responsible for hiring most of the journalists and other employees who worked for Project Veritas at the time of my termination. I was also the "face" of the organization from the point of view of the public, as I typically appeared on screen as the lead journalists in Project Veritas' video exposés.

11. As a result of my role as the founder, team leader, primary fundraiser, and public "face" of Project Veritas, my termination by Project Veritas was very upsetting to

many people who had supported Project Veritas financially and otherwise over the years. In the wake of my suspension and termination, I was contacted – without solicitation – by over a thousand such people, who consistently indicated that contributions they had made to Project Veritas had been made on the understanding that I would be stewarding the organization and that now that this was not the case, they wanted those funds to be returned.

12. My understanding is that Project Veritas performance as an organization has gone into steep decline since my departure, with complete exhaustion of the over \$10 million in cash reserves Project Veritas held at the time of my departure, and widespread layoffs in August of 2023 that left Project Veritas with just a handful of employees.

13. Because donations made to Project Veritas over the years were made by contributors who understood Project Veritas to be “mine”, I believe that most any ongoing fundraising Project Veritas is doing at this point results out of confusion on the part of donors, who are not aware that Project Veritas and I have now parted ways.

14. While OMG’s mission and market niche are similar to those I built at Project Veritas, OMG operates according to a wholly different revenue model than Project Veritas did. While Project Veritas was a non-profit entity almost entirely reliant on donations, OMG is a for-profit entity. It generates revenue through member subscriptions, advertising, merchandising, and some educational services. Individuals may obtain a subscription/membership by going to OMG’s website and proactively registering. While OMG accepts donations to help finance its work, contributors cannot receive a charitable tax deduction as they could in the case of Project Veritas, and

donations do not play the central role in driving revenue as they did at Project Veritas.

15. I am aware of the allegations made in this dispute by Project Veritas and Project Veritas Action Fund in their Amended Complaint and in their Motion for Preliminary Injunction, as well as the assertions contained in the Declarations of Ben Wetmore and Joseph Barton attached to the Motion for Preliminary Injunction.

16. During the time I worked for Project Veritas, its contributors would have numbered in the thousands. With regard to the assertion that I improperly took Project Veritas' "donor list" and then used it to solicit donors, I did not even have ready access to Project Veritas' centralized "donor list" during the time I ran Project Veritas. I did not take such list, and I have not had and do not have such list.

17. I have reviewed Exhibit 4 to Project Veritas/Project Veritas Action Funds' Motion for Preliminary Injunction, which is a series of Telegram exchanges between myself and my then assistant Asha Bolton on February 22, 2023. As mentioned above, in the time period after I was suspended from my work with Project Veritas, I had been inundated with communications from contributors who were demanding that their contributions be returned. Exhibit 4 reflects my effort to document that flood of requests and inquiries.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2024.

/s/ James O'Keefe
James O'Keefe